REMARKS

By this response, claims 1-23 are pending. Compared to prior versions, claims 1 and 9 are amended. All others remain original. The Applicant appreciates the allowance of claims 22 and 23, and the indication of allowability for claims 3-8, 10-14 and 18-21 if rewritten to overcome the rejections related to their base claim. Substantively, claims 1-2, 9, and 15-17 stand rejected as anticipated under 35 U.S.C. §102 by Kujirai (U.S. Published Patent Application No. 2001/0050781).

The Examiner relies on Kujirai's Figure 16, and attendant written description, e.g., paragraphs [0073] and [0076], *7-26-07 Office Action, p. 2, ¶ No. 2*, for anticipating each of the independent claims. As is clear, Figure 16 shows four print jobs spooled on a graphical user interface (GUI), each having "11 types of operations available when a [print] job is selected [by a user]" (¶ *[0075], ll. 1-2*). One of the eleven operations is a "COMBINE [operation], in which a plurality of jobs of spool files of intermediate code are combined into a single job." *Id.* At no time, however, do print jobs on Kujirai's GUI correspond to the to-be-printed "objects" on a "display list," as claimed, much less their COMBINE operation corresponding to a "replacing" of two or more "sequential objects" on the display list with a "new object," as skilled artisans understand the terms in light of the specification.

Nonetheless, to further delineate the display list of the present claims from Kujirai's spooled print jobs on a GUI, the Applicant amends claim 1 to recite that the to-be-printed objects are affirmatively "linked" together on the list and that the list is "not for viewing by an end user." As described in the specification, a "graphics engine, build[s], create[s] or otherwise construct[s] a display list having one or more to-be-printed objects for a given to-be-printed page." *Specification, p. 13, ll. 3-5.* In turn, a graphics engine is a processing structure internal to a rendering device (Figure 2), for example, that intermediately processes a print job, in software, and end users have no visibility to its construction, as they do spooled

jobs in a queue on a GUI. For at least this reason, claim 1 and its progeny define over the art.

"Linking together" is another consideration. That is, a memory pointer, for instance, "links together" display list objects 500-1, 500-2, 500-3, etc., on various display lists 600, and may include "head and tail pointers that delineate sequential objects." *E.g., Applicant's Specification, Figures 5-8, and p. 15, l. 20.* Kujirai, on the other hand, never "links" together its spooled print jobs. Instead, Kujirai simply lists them chronologically (i.e., "list form," ¶*[0073]*) on a GUI for users to see and/or select various operations. If a Kujirai user were to DELETE (¶ *[0075]*) one of the print jobs, spool file code would be eliminated for that job (¶ *[0075]*), but otherwise have no effect on the other print jobs. This lack of effect on other print jobs in the queue evidences the lack of "linked" items and, for at least this reason, claim 1 and its progeny define over the art, as amended.

In claim 9, *et seq.*, it is further required that the "constructing" of the display list include "constructing attributes ... for each of said objects," such as attributes of "an object type, an object region, or an object ink." From the specification, "attributes" are those items associated with objects that get "presented to the graphics engine in accordance with the language type of PDL," for instance. *Applicant's Specification, p. 13, ll. 16-17.* In turn, "object type" attributes correspond to "whether the to-be-printed object is an image, such as a jpeg, a stencil, such as a rectangle, or a character (a, b, c ... x, y, z, 0, 1, 2, ...)." *Applicant's Specification, p. 13, ll. 24-26.* "Object region" attributes correspond to "the physical location of the to-be-printed object on the to-be-printed page and the geography of the object type, such as the pixel dimensions of a rectangular stencil." *Applicant's Specification, p. 13, ll. 27-29.* "Object ink" attributes correspond "generally to how to 'paint' each pixel within the object region." *Applicant's Specification, p. 13, l. 31.*

Thereafter, the "determining" whether two or more of the sequentially linked objects "are combinable," in claim 9, includes the further decision making process of "examining

one or more of the attributes" of the objects. To the extent Kujirai's spooled print jobs on a GUI can even be considered objects on a display list (and the Applicant contends they cannot), nowhere do the Kujirai print jobs include attributes of object type, object region or object ink, much less determining the combination of the objects, in a COMBINE (¶ *[0075]*) or other operation, based upon an examination of the attributes. For at least this reason, claim 9 is allowable as written.

In claim 17, reconsideration is requested, without amendment to the claim, since the Examiner fails to make a *prima facie* rejection. Namely, the Examiner relies on the earlier-described Kujirai Figure 16 (and attendant written description) along with the sentence consisting of the argument: "the single combined object is readable upon the (not further defined) 'masked index image.'" *7-26-07 Office Action, p. 2,* ¶ *No. 2.* First, claim 17 includes limitations nowhere discussed by the Examiner, nor found in Kujirai. Namely, the claim requires 1) "constructing a look up table having entries corresponding to values of said masked image," and 2) "receiving an indication that said at least two to-be-printed objects have been presented," and nothing in the Examiner's rejection mentions these or where they are inherently or expressly found in the prior art. The record is wholly silent on the subject. Second, the Examiner mentions that the "masked index image" of the claim is "not further defined." For this, the Applicant is allowed to describe a masked index image in its specification and claim such, without further defining it. From the specification, a masked index image is adequately described to artisans of ordinary skill in the art on pages 16-18, in relation to Figures 11B-12C, for instance. For at least this reason, claim 17 is submitted as allowable, as written.

In that it is believed no other obstacles to patentability remain, the Applicant requests a timely Notice of Allowance be issued for all twenty-three claims. *To the extent any fees are due, although none are believed due, the undersigned authorizes their deduction from*

Deposit Account No. 11-0978. If any other matters require attention, please have the

Examiner contact the undersigned representative.

Respectfully submitted,

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